

Our Ref: T17 057

11th February 2021



Louise St John Howe
Programme Officer
PO Services
PO Box 10965
Sudbury
CO10 3BF

by email only louise@poservices.co.uk

Dear Louise

Response to the consultation on EX224 Updated Housing trajectory and Housing Supply Statement

We set out below comments of Hill Residential Ltd and the Royal Veterinary College with regards the consultation on EX224 the updated housing trajectory in relation to the Welwyn & Hatfield Local Plan.

We consider that it is not appropriate to plan for housing needs using a stepped trajectory. The Council's approach to sites for development appears to solely consider Green Belt implications. The NPPF requires a much more nuanced approach and that.

Paragraph 46 of EX212 identifies tackling affordability is a critical issue for the plan. We agree with that. In 2006 the median workplace based incomes to house price ratio for England stood at 6.95 whilst in in WHBC the ratio was 7.18, just 3% above the England average. In 2019 the ratio for England stands at 7.83 and WHBC at 10.5, some 46% higher than the England average. That 46% increase is the 5th highest change in the East of England across that period (Appendix 1). Since 2006, the England ratio has increased by 12.7% and since 2009, by 22%. Over the same periods the ratio in WHBC has increased by 46.2% and 29.1% respectively (see Appendix 2). Affordability in WHBC has been worsening relative to the average and is an issue which urgently needs be tackled now, not in the future. A stepped trajectory will not assist with that and affordability will remain a persistent issue.

In addition, a stepped trajectory will not help meet the needs for affordable housing. Such needs are not currently being met, and a stepped trajectory will exacerbate and worsen that. It is not acceptable for people most in need in society to continue to have to wait to access housing.

Based on WHBC's figures by March 2021 under delivery against the Council's proposed target of 13,800 will be 905 homes – that is 317 affordable homes not provided at 35%. However, against a need figure of 14,300 that under delivery would be 1,030 homes (of which 361 would be affordable) and at the currently identified need of 16,000, under delivery would be 1,455 homes (509 affordable). In order to meet affordable housing needs and tackle affordability issues, the plan should be seeking to facilitate delivery at the earliest opportunity and it is critical therefore that the plan seeks to maximise delivery in the next 5 years.

There is clear evidence that there are sites available that could deliver earlier than sites set out in the plan. HS22 at Brookmans Park is clear example of that. As we have set out in our statements elsewhere, the site can deliver within the 5 year period.

It is also extremely concerning that EX224 sets out that the target is 668 homes a year and that the trajectory is measured against that. The housing need proposed by WHBC is 690 homes a year or 13,800, unless the council has changed its position again. The trajectory, and consequently the annual shortfall, needs to be measured against the Plan target, whatever that may be. We attached a table comparing the shortfall against the alternative OAN's of 13,800, 14,300 and 16,000.

11th February 2021

Louise St John Howe
Programme Officer

The trajectory is difficult to comment on as the Council includes no assumptions about sites. How long to deal with planning applications, which sites require strategic infrastructure, which sites are in the hands of house builders, which are controlled by promoters and so will take longer to be delivered, what assumptions are made about number of outlets on strategic sites and homes per outlet? We consider that there are likely to be sites shown within the trajectory where delivery is earlier than is likely to be achieved. We consider that it will take longer to achieve the levels set out in the trajectory.

- Large town centre apartment schemes will typically require at least an 18 month built period before they can deliver completions. Any such sites which are expected to deliver by March 2023 will need to have commenced by September 2021 at the latest. In effect they would need to have permission now in order that pre-commencement conditions can be discharged to enable a start on site by then.
- We consider that larger sites which are proposed to be allocated by the local plan cannot be delivered any sooner than the trajectory we have set out for HS22. Adopting the same assumptions as we have used in our statement for HS22, we consider that the earliest any such sites could start to deliver by would be late 2023.
- Strategic sites (750+) will take longer. Assuming the plan is adopted at the end 2021, and a developer has taken the decision to prepare and submit such an application ahead of adoption, the Council might resolve to grant permission in Q2 2022. On scheme of that size the earliest an executed S106 might be achieved is six months – say Q4 2022. Allowing six months to discharge pre-commencement conditions, strategic infrastructure works might start in Q2 2023. Whilst those works are progressing house builders would submit Reserved Matters and discharge parcel specific conditions which could allow a start on house building in Q2 2024, with first completions in Q2 2025.

Adopting a stepped trajectory would have negative environmental, social and economic consequences and runs counter to the Government's objectives for the planning system. Tackling affordability and delivering new market and affordable homes are fundamental sustainability issues. The Council has taken no account of this as an issue in deciding which sites to allocate. Accordingly, the ability of sites to deliver earlier should be taken into account as part of the overall assessment of sites.

Yours sincerely

Colin Campbell
Head of Planning
colincampbell@hill.co.uk
07714 739085

Encs